

Joyce W. Lindauer
State Bar No. 21555700
Joyce W. Lindauer Attorney, PLLC
1412 Main Street, Suite 500
Dallas, TX 75202
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
Attorneys for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

2999TC ACQUISITIONS, LLC,

Debtor.

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CASE NO. 21-31954-hdh

Chapter 11

DEBTOR'S WITNESS AND EXHIBIT LIST

Comes now 2999TC Acquisitions, LLC, debtor in the above-styled and numbered bankruptcy case ("Debtor"), and files this its Witness and Exhibit List for the hearing scheduled on June 10, 2022.

Witnesses

At the hearing, the Debtor may call the following persons to testify as witnesses:

1. Tim Barton
2. Khudabuksh K. Walji
3. Randy Marx
4. Garrison Kickham
5. Marshal Dooley
6. Bob Blanshard
7. Vipin Nambiar
8. Any witness designated by any other party

Exhibits

At the hearing the Debtor may present one or more of the following exhibits:

Exhibit No.	Description	Offered	Admitted
D1	Docket Sheet		
D2	Debtor's Response in Opposition to Motion to Enforce Agreed Orders [to be provided]		
D3	May 30, 2022 Letter directed to HNGH, by and through its counsel, listing the need for the HNGH Deliverables		
D4	Term Sheet as approved by First Guaranty Bank		
D5	Rescission of Deed instrument, as requested by Debtor, and counsel to its purchaser and/or investor therein		
D6	Redline version of Rescission of Deed instrument, as requested by Debtor, and counsel to its purchaser and/or investor therein		
D7	Happy State Bank Payoff – for Collateral Assignment of Note and Lien resolution		
D8	Email from Julie Lyssy at Sendera Title requesting Assignment from Axos Bank to 2999 Turtle Creek LLC		
D9	Lender Letter		
D10	Declaration of Timothy Barton		
D11	Declaration of Joey Howell		
D12	Agreed Order Regarding Motion to Lift Stay [Doc. 10], Motion to Dismiss [Doc. 9], Motion for Sanctions [Doc. 15], and Motion to Enforce Stay [Doc. 14] [Docket No. 64]		
D13	Agreed Order Modifying Order on Motion to Dismiss and for Relief from Stay [Docket No. 94]		
D14	Various versions of Special Warranty Deed		
D15	Payments Made to HNGH		

Exhibit No.	Description	Offered	Admitted
D16	Collateral Assignment to Happy State Bank [to be provided]		
D17	Proof of Claim No. 3 filed by HNGH Turtle Creek, LLC		
D18	Emails of May 16, 2022 between Joyce Lindauer and John J. Kane regarding Status Update and Conf Order		
D19	Emails of May 29, 2022 between Joyce Lindauer and John J. Kane regarding Confidential – Title Matters		
D20	Emails of May 30, 2022 between Joyce Lindauer, John J. Kane, and Khudabuksh K. Walji		
D21	Emails of May 30, 2022 between Joyce Lindauer and John J. Kane		
D22	Emails of May 30, 2022 between Joyce Lindauer and John J. Kane regarding Closing Checklist		
D23	Emails of May 31, 2022 between Joyce Lindauer and John J. Kane regarding HNGH – Wiring Instructions for Title Co.		
D24	Emails of May 31, 2022 between Joyce Lindauer and John J. Kane regarding Letter List		
D25	Appraisal Report dated May 23, 2022		
D26	Debtor's Third Amended Plan of Reorganization [Docket No. 108]		
D27	Order Confirming Debtor's Third Amended Plan of Reorganization [Docket No. 123]		
	Any exhibits identified by any other party		

Debtor reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and reserves the right to call additional witnesses and introduce additional exhibits in rebuttal. Debtor further reserves the right to supplement this list prior to the hearing.

Dated: June 7, 2022.

Respectfully Submitted

/s/ Joyce W. Lindauer

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PROPOSED ATTORNEYS FOR 2999TC

ACQUISITIONS, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 7, 2022, a true and correct copy of the foregoing document was served via email pursuant to the Court's ECF filing system upon the parties receiving electronic notice in this case listed below.

Katherine T. Hopkins

katherine.thomas@kellyhart.com

John J. Kane

jkane@krcl.com, ecf@krcl.com; jkane@ecf.courtdrive.com

Sherrel K. Knighton

Sherrel.Knighton@lgbs.com, [Dora.Casiano-](mailto:Dora.Casiano-Perez@lgbs.com)

Perez@lgbs.com; Sean.French@lgbs.com; Dallas.Bankruptcy@lgbs.com

Joyce W. Lindauer

joyce@joycelindauer.com,

dian@joycelindauer.com; deann@joycelindauer.com; 12113@notices.nextchapterbk.com

Steven C. Metzger

smetzger@pmklaw.com

Russell Hale Neilson

hneilson@parkinslee.com, hneilson@ecf.courtdrive.com

United States Trustee

ustregion06.da.ecf@usdoj.gov

Debtor's Witness and Exhibit List

Kyle Woodard

kwoodard@krcl.com, KWoodard@ecf.courtdrive.com

/s/ Joyce W. Lindauer

Joyce W. Lindauer